

**GOTTLIEB & ASSOCIATES**  
ATTORNEYS

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June 21, 2022

**VIA ECF**

The Honorable Katherine Polk Failla  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Williams v. Rhythm Of Life Corp.*,  
Case No.: 1:22-cv-2718

Dear Judge Failla,

The undersigned represents Milton Williams, on behalf of himself and all other persons similarly situated (“Plaintiff”) in the above referenced matter against Defendant, Rhythm Of Life Corp., (“Defendant”). The undersigned respectfully requests that the Initial Conference scheduled for June 23, 2022 at 3:00 PM (Dkt. 7) be adjourned for 60 days because Counsel for Defendant has not yet answered or appeared in this action. This request will grant ample time for the Defendant to retain counsel and for Defendant’s Counsel to appear and discuss a possible resolution with Plaintiff’s Counsel. This is the Plaintiff’s first request for an adjournment.

We appreciate this Court’s and Your Honor’s time and attention to this matter. Thank you for your anticipated cooperation in this matter. Should the Court have any questions, please do not hesitate to contact the undersigned attorney.

Respectfully submitted,

GOTTLIEB & ASSOCIATES

/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.

Application GRANTED. The initial pretrial conference scheduled for June 23, 2022, is hereby ADJOURNED to **August 18, 2022, at 11:00 a.m.** The Clerk of Court is directed to terminate the pending motion at docket number 8.

Dated: June 21, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE